UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

CITIBANK, N.A.,

Plaintiff,

V.

BOMBSHELL TAXI LLC, et al.,

Defendants.

Civil Action No. 1:15-cv-05938

## **NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that Brett A. Berman of the law firm Fox Rothschild LLP, hereby enters his appearance as counsel for Evgeny (Gene) Freidman in the above-captioned proceeding. Mr. Berman's contact information is:

Fox Rothschild LLP 100 Park Avenue, 15<sup>th</sup> Floor New York, New York 10017 Attn: Brett A. Berman

Tel: (212) 878-7900 and (215) 299-2842 Fax: (212) 692-0940 and (215) 299-2150

Email: bberman@foxrothschild.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes, without limitation, all orders and notices, including, but not limited to, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, telecopier, or otherwise.

This appearance and request for notice is without prejudice to the rights, remedies and claims of Evgeny (Gene) Freidman against other entities or any objection by Evgeny (Gene)

Freidman that may be made to the subject matter jurisdiction of the Court or the propriety of

venue herein and shall not be deemed or construed to submit Evgeny (Gene) Freidman to the

jurisdiction of the Court. All rights, remedies and claims are hereby expressly reserved, including

without limitation, the making of a motion seeking abstention, withdrawal, dismissal or transfer

of the case or a proceeding therein.

FURTHER, if any limited service lists are used in these proceedings, the undersigned

requests inclusion thereon.

Dated:

New York, New York

July 30, 2015

Respectfully submitted,

FOX ROTHSCHILD LLP

Counsel to Evgeny (Gene) Freidman

By: /s/ Brett A. Berman

Brett A. Berman

100 Park Avenue, 15<sup>th</sup> Floor

New York, New York 10017

Tel: (212) 878-7900 and (215) 299-2842